WIGGINS, CHILDS, PANTAZIS, FISHER GOLDFARB, PLLC

A PROFESSIONAL LIMITED LIABILITY COMPANY

1850 M STREET, N.W. SUITE 720 WASHINGTON, DC 20036

Telephone (202) 467-4489 (direct dial) Facsimile (205) 314-0805 Email: tfleming@wcqp.com

May 28, 2015

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Via Electronic Submission

The Honorable Katherine B. Forrest UNITED STATES DISTRICT JUDGE Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: In Re 650 Fifth Avenue and Related Properties, 1:08-cv-10934 (KBF) and related cases

Dear Judge Forrest:

Principally due to my having attended a family reunion over the Memorial Day weekend, the Havlish Plaintiffs request a short extension of time, until Tuesday, June 2, 2015, to file their Reply to the Oppositions of Alavi Foundation and 650 Fifth Avenue Company to the Havlish Plaintiffs' Motion for Modification of, or Relief from, Protective and Confidentiality Orders.

The Havlish Plaintiffs' Reply to the opposition of Assa Corporation and Assa Company, Ltd., to the same motion is due on that date, June 2, 2015. We would like to file only one consolidated reply.

Counsel for Alavi and 650 Fifth Avenue Company, Daniel Rozumna, has stated to me that he has no objection to this request. Counsel for the Assa companies, Donald Luke, has also stated that he has no objection to this request.

Respectfully submitted,

Timothy B. Fleming

WIGGINS, CHILDS, PANTAZIS, FISHER GOLDFARB PLLC

Counsel to the Havlish Judgment Creditors

cc: All Counsel of Record via email

THE KRESS BUILDING 301 19TH STREET NORTH BIRMINGHAM, AL 35203 (205) 328-0640 1850 M STREET, N.W.

SUITE 720

WASHINGTON, D.C. 20036

202)467-4489

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